

EXHIBIT M

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

Case No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to:

St. Charles Parish Public Schools v. Meta
Platforms Inc., et al.

Case No.: 4:24-cv-01098

**PLAINTIFFS' SUPPLEMENTAL
ANSWERS TO DEFENDANTS'
INTERROGATORIES TO ST.
CHARLES PARISH SCHOOL
DISTRICT (SET 1)**

PROPOUNDING PARTY: Defendants

RESPONDING PARTIES: St. Charles Parish School District

INTERROGATORIES: SET ONE (1)

DATE OF SERVICE: April 28, 2025

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of this judicial district, St. Charles Parish Public Schools ("Plaintiff"), through the undersigned counsel, hereby provides these supplemental answers and objections to the Defendants' Interrogatories to St. Charles Parish Public Schools (Set 1) (the "Interrogatories").

PRELIMINARY STATEMENT

Plaintiff has undertaken a reasonable effort to provide the information requested by these Interrogatories to the extent the requested information is not subject to objection. The following answers and objections are based upon documents in Plaintiffs' possession and are not prepared from any personal knowledge of any single individual. Accordingly, all the following responses are given without prejudice to, and with the express reservation of, Plaintiff's right to supplement

1 or modify its responses and objections to address additional information, and to rely upon any and
2 all such information and documents at trial or otherwise.

3 **OBJECTIONS TO DEFINITIONS**

4
5 The following applies to this Interrogatory:

6
7 Plaintiff objects to Defendants' definition of "Alleged Harm" on the grounds that it calls
8 for a legal conclusion or expert opinion. Further, as discovery is in its preliminary stages and is
9 ongoing, and the factual record is not yet complete, additional injury and harms may need to be
10 supplemented during fact discovery or expert discovery.

11 Plaintiff objects to Defendants' definition of "Relevant Time Period" as it is overbroad,
12 calls for a legal conclusion or Expert Opinion, and is inconsistent with the relevant time frame thus
13 far established in this litigation. "Relevant Time Frame" shall mean from the August 1, 2017 to
14 April 1, 2024 or the date of collection, whichever is earlier. Plaintiff reserves the right to change
15 or modify the Relevant Time Frame based on further investigation or fact and/or expert discovery.

16 Plaintiff objects to Defendants' definition of "Plaintiff," "You," and "Your," as overly
17 broad, unduly burdensome, and seeking the production of information that is not relevant to the
18 claim or defense of any party, not proportional to the needs of the case, and not reasonably
19 accessible to Plaintiffs upon reasonable diligence. Furthermore, the definition of these terms is
20 over broad to the extent it would require Plaintiff to respond to these Interrogatories for people
21 "purporting to act on its behalf" and to the extent it purports to include any of the persons identified
22 in their personal capacities rather than as officers and employees of Plaintiff. Plaintiff objects
23 further to this definition as seeking Privileged Information because the definition includes
24 Plaintiff's attorneys.

Plaintiff's answers are made without waiving its right to object (on the grounds of relevancy, hearsay, materiality, competency, or any other ground) to the use of its responses in any subsequent stage or proceeding in this Action or any other action. If Plaintiff, in response to any Interrogatory, inadvertently produced information that is or could be the subject of the objections stated herein, such production is not intended to be, nor is it deemed to be, a waiver of the objections with respect to such information provided or withheld.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1: Identify every Person likely to have discoverable information related to Plaintiff's claims, including Persons (a) likely to have personal knowledge that supports or contradicts a position or claim that You have taken or intend to take in this Action, or (b) upon whom You intend to rely in proving Your claims, and for each such Person, and for each such Person, describe that personal knowledge.

RESPONSE:

Plaintiff objects to this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the case to the extent it purports to require Plaintiff to identify "every Person" whether employed by Plaintiff or third parties, or any other Person who may have any knowledge concerning the claims in the action. Plaintiff objects further to this Interrogatory to the extent it calls for the mental impressions of counsel, the identity of non-testifying experts, the premature disclosure of the identity of testifying experts, or otherwise seeks information protected from disclosure by the attorney-client privilege or work product doctrine. Plaintiff will make appropriate expert disclosures pursuant to deadlines set by the Court and in accordance with the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Plaintiff states, based on the information currently available to it, that the following persons currently or formerly employed by Plaintiff may have unique, material knowledge of Plaintiff's allegations in this action and can be contacted through Plaintiff's counsel:

PERSONS	POSITIONS	SUBJECT MATTER OF EACH PERSON'S KNOWLEDGE
Ken Oertling	Superintendent	Oversees district-wide student wellbeing and behavior initiatives.
Jerry Smith	Executive Director of Child Welfare & Attendance and Student Services	Knowledge of how social media addiction affects student attendance, mental health, and overall behavior.
Stephanie Steib	Former Director of Technology	Understands past patterns of student technology use and digital behavior.
Kelsey Hegel	Executive Director of Informational Technology Services	Knows about technical access patterns

Ronald White	Chief Financial Officer	Knowledge of accounting for programs addressing social media addiction.
David Schexnaydre	Executive Director of Secondary Schools	Familiar with how social media impacts student behavior and discipline in middle and high schools.
Erin Grainer	Assistant Superintendent of Curriculum, Instruction and Assessment	Understands how social media addiction may hinder academic engagement and learning outcomes.
Tresa Webre	Executive Director of Human Resources	Knowledge of staff support programs addressing student issues.
Tamika Green	Executive Director of Equity and Student Support	Aware of how social media addiction affects certain student groups and their behavior.
D ■■■ G ■■■	J.B. Middle School Student	Firsthand experience of peer insight into the behavioral and emotional impacts of social media use

Jason Madere	Destrehan High School Principal	Aware of student behavior trends and discipline issues linked to social media addiction.
Sean Dwyer	Harry Hurst Middle School Principal	Aware of, observes, and manages student behavior trends and discipline issues linked to social media addiction.
Alice Cryer Sumler	Student Counseling and Student Support Specialist	Knowledge of the emotional, social, and behavior effects of social media addiction on students.
Kade Rogers	Executive Director of Safety, Athletics, and Ancillary Services	Knowledge of trends in student conduct and emergencies related to social media use.
D [REDACTED] T [REDACTED]	Hahnville Highschool Student	Firsthand experience of peer insight into the behavioral and emotional impacts of social media use.
Jose Gonzales II	Hahnville High School Principal	Aware of, observes, and manages student behavior trends and discipline issues linked to social media addiction.

Pastor Charles Johnson	Community Advocate	Observed community-level involvement by the district to address claims against Defendants
Steve Stillinger	Student Advocate	Practical insight into how social media addiction affects students.
Angelle Babin	Executive Director of Elementary Schools	Familiar with how social media impacts student behavior and discipline in elementary schools.

INTERROGATORY NO. 2:

For each Defendant, state the years during which You claim such Defendant engaged in conduct for which You seek damages, as well as the time period for any abatement or other equitable relief.

RESPONSE:

Plaintiff objects to this Request as vague as it does not identify the demographics being requested beyond age and gender. Plaintiff further objects to this Request as overly broad, unduly burdensome, and disproportionate to the needs of the case because it seeks student demographic information that is not relevant to the action. Plaintiff objects to the Interrogatory as premature to the extent it seeks information about subjects of ongoing discovery, including expert discovery. Plaintiff's investigation is ongoing, Plaintiff has not received sufficient discovery from Defendants, and the factual record is incomplete. Plaintiff objects to the

1 Interrogatory to the extent it calls for expert opinion. Plaintiff objects further because the
2 Interrogatory is compound, consisting of multiple subparts relating to 1) years of Defendants'
3 relevant harmful conduct for which damages are sought and 2) the time period for abatement or
4 other equitable relief. Subject to and without waiving the foregoing objections, Plaintiff states,
5 based on the information currently available, that Defendants have engaged in conduct over the
6 following timeframes which has led to the Plaintiff's damages and/or requires abatement or other
7 equitable relief. For the Meta Defendants, at least back to 2004. For the TikTok Defendants, at
8 least back to 2012. For the YouTube Defendants, at least back to 2005. For Defendant Snap Inc.,
9 at least back to 2011. Plaintiff states further that it will make appropriate expert disclosures
10 concerning damages and abatement or other equitable relief in accordance with the deadlines set
11 by the Court and the Federal Rules of Civil Procedure.

12
13 **INTERROGATORY NO. 3:**

14 Separately identify and describe (including the date, location, nature and extent, and cost
15 of repair or replacement) every instance of vandalism, property damage, or criminal action You
16 contend occurred as a result of Online Media & Communications Services.

17
18 **ORIGINAL ANSWER TO INTERROGATORY NO. 3:**

19 Plaintiff objects to this Request as overly broad and unduly burdensome to the extent it
20 encompasses information not relevant to the parties' claims or defenses and would require Plaintiff
21 to collect, review, and/or produce information that is disproportionate to the needs of this case or
22 to create documents that do not exist and describe every instance of vandalism, property damage,
23 or criminal action that occurred as a result of social media regardless of whether Plaintiff intends

1 to claim such damage as damages in this action. Plaintiff objects further to the Interrogatory as
2 vague and ambiguous because the phrase “property” damage is subject to multiple interpretations
3 and may call for a legal conclusion. Plaintiff objects further to this Interrogatory as premature to
4 the extent it seeks expert opinion and because discovery is in its preliminary stages. Plaintiff’s
5 investigation is ongoing, Plaintiff has not received sufficient discovery from Defendants, and the
6 factual record is incomplete. Plaintiff objects further because the Interrogatory is compound,
7 consisting of multiple subparts relating to 1) vandalism, 2) property damage, or 3) criminal action.
8 Plaintiff had to install a web filter/application "Bark" to flag threats of violence, suicidal ideations,
9 etc. Bark has the capacity to conduct scans of messages, 30+ social media apps, web browsers,
10 emails, and other online activity, The date of implementation will be supplemented. Plaintiff had
11 to install an inline filtering tool on its systems to filter out social media sites for students and guests
12 on the school networks. Documents with the name of this tool, date of installation, and cost will
13 be supplemented. Plaintiff had to install a web filter/application "Bark" to flag threats of violence,
14 suicidal ideations, and other risky behavior. Bark scans your child’s text messages, 30+ social
15 media apps, web browsers, emails, and other online activity, keeping you informed, and your child
16 protected. Documents with the name of this tool, date of installation, and cost will be
17 supplemented. Twenty school system sites have implemented Raptor, an electronic visitor
18 management system. This system checks visitors against the National Sex Offender Registry.
19 Plaintiff has Integrated school safety software to twenty-four sites. Documents with the name of
20 this tool, date of installation, and cost will be supplemented.

21
22 Plaintiff has implemented a curriculum in which students are tested on the following
23 lessons: -Learning in the Digital Age - Becoming a Digital Leader - Practicing Netiquette -

1 Understanding Cyberbullying -Staying Safe Online - Evaluating Information. Documents with the
2 name of this tool, date of installation, and cost will be supplemented. Plaintiff had to install
3 "KnowBe4," an application to enhance cybersecurity awareness and training, thereby protecting
4 against threats such as phishing and other cyber-attacks. The date of implementation will be
5 supplemented. Documents with the name of this tool, date of installation, and cost will be
6 supplemented. Plaintiff had to install "ContentKeeper," an inline filtering tool on its systems to
7 filter out social media sites for students and guests on the school networks. Documents with the
8 name of this tool, date of installation, and cost will be supplemented. Plaintiff has had to install
9 additional security cameras due to property damage to their schools and property. Documents with
10 date of installation and cost will be supplemented.

11
12 **SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 3:**

13 Plaintiff repeats and incorporates by reference the previous objections it has made to this
14 Interrogatory. Plaintiff specifically objects to this Interrogatory because it would require Plaintiff
15 to collect, review, and/or produce information and to create a documents describing every instance
16 of vandalism, property damage, or criminal action that occurred as a result of social media.
17 Nevertheless, in the spirit of cooperation, and without waiving this objection, Plaintiff has created
18 a chart of incidents of property damage caused by student vandalism and as well as incidents of
19 criminal conduct as an accommodation to Defendants.

20 Subject to and without waiving the foregoing objections, Plaintiff states that over the last
21 several years, Plaintiff has incurred considerable damage to its property resulting from Defendants
22 promoting, developing, or participating in the creation of social media platforms which promote
23 addictive and compulsive use by Plaintiff's students.

The lists below include information Plaintiff was able to discern following a reasonably diligent investigation. Chart A reflects non-bathroom vandalism acts and Chart B reflects bathroom vandalism. Where information is not included, Plaintiff is in the process of confirming the costs associated with the destructive actions. Further, Plaintiff produced Expulsion Reports and Vandalism Reports reflecting the conduct of each student, property damage due to student vandalism, criminal acts, and other misconduct which led to disciplinary actions against the students. The cost of repairing damages was provided by Plaintiff's maintenance staff.

Plaintiff has good cause to believe that the above identified incidents, as well as the incidents set forth in the Expulsion Reports, were caused by Defendants' conduct. In addition to the expenses identified above, Plaintiff has expended significant human resources to address these harms. In some instances, no direct expense is tracked because the damage was remediated by Plaintiff's staff using existing maintenance inventory or did not require direct expense but, rather, staff time to remediate. In addition, these incidents prevented Plaintiff from full use and enjoyment of its property at various times.

CHART A

Date of Incident	School Site	Description of Damage	Expense /Cost
1/20/2023	Hahnville High School	Door Torn Off at the Hinge	\$74.73
3/17/2023	Hahnville High School	Student Ripped Off Cover on Wall Requiring Painting Portion of the Wall	\$74.73

5/17/2022	Hahnville High School	Door Broken By Student – Installation of Locking Clasp to Secure Doors	\$37.37
8/8/2023	Harry M. Hurst, Middle School	Locks (6) Covered in Cement Due to Student's Vandalism	\$79.54
8/8/2023	Harry M. Hurst, Middle School	Lock Covered in Cement Due to Student's Vandalism	\$26.20
9/7/2023	Destrehan High School	Faucets in Locker Room were Broken and Needed to be Replaced Due to Student's Vandalism	\$70.95
9/15/2023	Destrehan High School	Smoke Detector Damaged By Students in Boys' Restroom on Nurse's Office Side in Cafeteria	\$36.94
11/1/2022	Mimosa Park	Students Cut Wires on Top of Fence Along the Bus Circle	\$45.85
1/9/2023	Hahnville High School	Fight in Parking Lot – Four Individuals Involved – Started in a Group Chat in Which Two of the Students Offended When One of the Individuals Made and Offensive Joke About A Different Student's Suicide; All Students Disciplined for Fighting – Battery - Criminal Act	N/A
9/6/2024	Luling Elementary School – Building D	Damage to New Sheet Rock Wall Caused by Student Vandalism	Unknown

4/18/2024	Destrehan High School	Damage to Lower Wall Panel and Glass Panel Requiring Repair – (A student kicked out the exterior wall section while having a disruptive episode in class. Immediate repairs necessary to prevent outside access to the classroom)	\$438.50
4/18/2024	Destrehan High School	Damage to Lower Wall Panel and Glass Panel Requiring Repair – (A student kicked out the exterior wall section while having a disruptive episode in class. Immediate repairs necessary to prevent outside access to the classroom)	\$438.50
4/29/2021	Unknown	Damage to Laptop Computer Caused by Student Vandalism Requiring Replacement of Computer	Unknown
3/14/2024	J.B. Martin Middle School – Building C	Graffiti on Walls of Boys’ Bathroom Stalls	Unknown
1/30/2024	Hahnville High School	Battery on a School Employee – Criminal Act – Expulsion	N/A
8/19/2022	Destrehan High School	Battery of Another Student on Bus with Sharp Object on Several Occasions – Criminal Action – Expulsion	N/A
2/24/2015 (Approx.)	J.B. Martin Middle School	Student Damaged Back Door of School – Vandalism and Criminal Act	Unknown

8/15/2023	Hahnville High School	Battery on a Teacher and Other School Employees – Criminal Act	Unknown
9/22/2022	Luling Elementary School	Knife: Student Possessed a Blade 2.5 inches or Longer and Vandalized Bus Seats By Causing Damage in Excess of \$200.00 to Bus Seats with Blade	Over \$200.00 (Exact Number Unknown at This Time)
2/2024	Unknown	Vandalism; Obscene behavior/pornographic materials	Unknown
TOTAL			\$ ~ 1,084.81

CHART B

BATHROOM VANDALISM

(next page)

Work Order ID	Location	Building	Request Description	Request By	Submittal Date	Area Description	Area Number	Created By	Craft	Project Code	Assigned To	Action Taken	Actual Completion Date	Cost
92032	Destrehan High School - DHS	L Building (Addition 2014)	The students have peeled the film off of the window in the boys' restroom downstairs of the L Building.	Jack Bryant	1/14/2016	Restroom (Boys)	Downstairs	Jack Bryant	Windows	Vandalism	Simon, Paul	01/19/16 Approved by Barney to call Laplace Glass 02-02-2016 job done	1/14/2016	\$343.77
103966	Cammon, Albert, Middle School - ACM	A Building (Formerly Main, Cafe., Ctr. 1,2,3,4,&5)	pipe was kicked out of wall under urinal. Restroom is out of order	Erika Ide	3/16/2017	Restroom (Boys)	boys restroom	Erika Ide	Plumbing	Vandalism	Landecher, James	done.	3/16/2017	\$35.96
103237	Hahnville High School - HHS	D Building (Formerly Math)	We need to put in work order for D building boys bathroom. A lot of Graffiti on wall. Johnny said would need to repaint because could not get off. Contact Willie for same color paint and custodian can repaint.	Brian Lumar	2/15/2017	Building	D Building	Brian Lumar	Graffiti	Vandalism	Songy, Doug		2/15/2017	\$115.17
105556	Hahnville High School - HHS	B Building (Formerly Gym)	the hand sink the kid's bust it around the corner need replace	Gwendolyn White	5/12/2017	Gym	GYM boy's	Gwendolyn White	Plumbing	Vandalism	Songy, Doug		5/12/2017	\$171.73
104100	Vial, R.J., Elementary School - RJV	A Building (Formerly Main bldg.)	Hand washing sinks in student restrooms are being removed from the wall. We need sinks in all student restrooms secured to the wall so that they can not be removed.	Hulonda Tastet	3/23/2017	Restroom (Boys)	Boys & Girl Restrooms	Hulonda Tastet	Plumbing	Vandalism	Dufrene, Oliver		3/23/2017	\$164.86
109665	Luling Elementary School - LES	B Building (Formerly Wing 1)	building b the sink fell off the wall and needs to be replace. can we get quote of how much it will cost to replace it per ms cotton	joanne Matherne	9/20/2017		girls restroom	joanne Matherne	Restrooms	Vandalism	Calandra, Mike		9/20/2017	\$305.44
119757	Hurst, Harry M., Middle School - HHM	D Building - New Wing	Sink in boy's restroom in upstairs D has been pulled from the wall and is hanging.	Deborah Barrette	9/11/2018	Restroom (Boys)	D upstairs boy's	Deborah Barrette	Plumbing	Vandalism	Frickey, Chris	Sink was pulled from wall. Put new anchors and is operable	9/11/2018	\$0.00
121878	Lakewood Elementary School - LWE	B Building (Formerly Annex)	bathroom door fell off hinge and needs repair	Valerie Dauphin	11/14/2018	Bathroom	boys	Valerie Dauphin	Doors and Hardware	Vandalism	Green, Robert	Door repaired on 2/5/19. rg	11/14/2018	\$18.87
129894	Destrehan High School - DHS	Other	bathroom door is completely off	Carolyn Berger	8/28/2019	Locker Room	baseball locker room	Carolyn Berger	Doors and Hardware	Vandalism	Mullins, Jesse		8/28/2019	\$24.48
130562	Destrehan High School - DHS	B Building (Formerly Humanities)	sink is pulled from wall and hanging . Water was turned off because pipe is leaking	Carolyn Berger	9/19/2019	Restroom (Boys)	upstairs boys	Carolyn Berger	Plumbing	Vandalism	Petit, Jordan		9/19/2019	\$49.84
132438	Hahnville High School - HHS	C Building (Formerly Industrial Arts)	The door in the boys' locker room leading to the wrestling room has been destroyed. Please address.		11/20/2019			Myra Baudoin	Doors and Hardware	Vandalism	Bourgeois, Thomas		11/20/2019	\$0.00
132683	Hahnville High School - HHS	Stadium	there's two soap dispenser that's off the wall. He (Paul) don't have the tools to put them back up.	Tawana Bovie	12/3/2019	Restroom (Boys)	home side	Tawana Bovie	Restrooms	Vandalism	Bourgeois, Thomas	Replaced 2 soap dispensers with new ones.	12/3/2019	\$0.00
132868	Hahnville High School - HHS	D Building (Formerly Math)	Someone has torn 2 soap dispensers off the wall near the sinks and are in need of replacing	Thomas Bourgeois	12/10/2019	Bathroom		Thomas Bourgeois	Equipment	Vandalism	Bourgeois, Thomas		12/10/2019	\$0.00
140450	Hahnville High School - HHS	G Building (Addition 2014)	two doors to the stalls are broken	Tawana Bovie	12/7/2020	Restroom (Boys)	2nd floor	Tawana Bovie	Restrooms	Vandalism	Bourgeois, Thomas	New latches are on order	12/7/2020	\$53.79
140193	Hahnville High School - HHS	C Building (Formerly Industrial Arts)	The sink has come off the wall in the girls restroom in the C building and it needs to be serviced ASAP.	Shawn Heiden	11/23/2020	Restroom (Girls)	C bldg girls restroom	Shawn Heiden	Plumbing	Vandalism	Bourgeois, Thomas		11/23/2020	\$275.05
140587	R. K. Smith Middle School - RKS	Main	Need to replace stall door and pilaster that holds door. Door was pulled off pilaster and hinges and broke.	Mike Calandra	12/11/2020	Bathroom		Mike Calandra	Partitions	Vandalism	Calandra, Mike		12/11/2020	\$650.80
140450	Hahnville High School - HHS	G Building (Addition 2014)	two doors to the stalls are broken	Tawana Bovie	12/7/2020	Restroom (Boys)	2nd floor	Tawana Bovie	Restrooms	Vandalism	Bourgeois, Thomas	New latches are on order	12/7/2020	\$53.79
140193	Hahnville High School - HHS	C Building (Formerly Industrial Arts)	The sink has come off the wall in the girls restroom in the C building and it needs to be serviced ASAP.	Shawn Heiden	11/23/2020	Restroom (Girls)	C bldg girls restroom	Shawn Heiden	Plumbing	Vandalism	Bourgeois, Thomas		11/23/2020	\$275.05

142815	Luling Elementary School - LES	C Building (Formerly Wing 2)	Building C, Boys Bathroom – Sink fell and broke, need replacement. Please see Sam to discuss possible extra brace support on sinks in Building C Restrooms	Shanice Hill	3/25/2021		bld C boys bathroom	Shanice Hill	General Maintenance	Vandalism	Calandra, Mike		3/25/2021	\$0.00
148636	Cammon, Albert, Middle School - ACM	Other	students are hitting knobs for sinks in all boys restrooms and popping the spring in the sink fixture. Please check all	Erika Ide	11/1/2021	Bathroom	all restrooms	Erika Ide	Restrooms	Vandalism	Landeche, James	done.	11/1/2021	\$208.49
148705	Hahnville High School - HHS	A Building (Formerly Main)	There is a sink in the boys bathroom near the bus circle student entrance which needs to be repaired ASAP.	Shawn Heiden	11/3/2021	Restroom (Boys)	Boys' RR near bus circle student entrance	Shawn Heiden	Plumbing	Vandalism	Bourgeois, Thomas	Reconnected sensor wires and cut water lines and added new batteries	11/3/2021	\$99.64
149499	Hahnville High School - HHS	G Building (Addition 2014)	There is a door that came off of the stall in the boys restroom upstairs in the G building. The custodian put the door in the custodial closet and it needs to be re-hung.	Shawn Heiden	12/7/2021	Restroom (Boys)	Stall door in boys restroom upstairs G bldg	Shawn Heiden	Doors and Hardware	Vandalism	Bourgeois, Thomas	Reinstalled the door on the stall	12/7/2021	\$49.82
150032	Hahnville High School - HHS	G Building (Addition 2014)	All of the toilet paper dispensers in the boys upstairs bathroom stalls have been pulled off the wall in the G Bldg. and 1 stall in the girls upstairs stall the dispenser is off the wall. Also downstairs in the G Bldg. both girls and boys restroom stall have toilet paper dispensers off the wall and all need to be fixed.	Shawn Heiden	1/6/2022		Boys and Girls restroom stalls	Shawn Heiden	Restrooms	Vandalism	Bourgeois, Thomas	Repaired and replaced toilet paper dispenser's	1/6/2022	\$49.82
150724	Norco Elementary School	B Building (Formerly Wing 3)	Sink in the boys bathroom is off the wall.	Sandra David	1/28/2022	Restroom (Boys)	Boys Restroom	Sandra David	Plumbing	Vandalism	Frickey, Chris	Mounted sink back to wall and replaced broken ptrap and faucet	1/28/2022	\$184.55
148636	Cammon, Albert, Middle School - ACM	Other	students are hitting knobs for sinks in all boys restrooms and popping the spring in the sink fixture. Please check all	Erika Ide	11/1/2021	Bathroom	all restrooms	Erika Ide	Restrooms	Vandalism	Landeche, James	done.	11/1/2021	\$208.49
148705	Hahnville High School - HHS	A Building (Formerly Main)	There is a sink in the boys bathroom near the bus circle student entrance which needs to be repaired ASAP.	Shawn Heiden	11/3/2021	Restroom (Boys)	Boys' RR near bus circle student entrance	Shawn Heiden	Plumbing	Vandalism	Bourgeois, Thomas	Reconnected sensor wires and cut water lines and added new batteries	11/3/2021	\$99.64
154387	Destrehan High School - DHS	A Building	Boys soap dispenser broken off of wall	Jesse Mullins	6/8/2022	Bathroom	near cafe	Jesse Mullins	General Maintenance	Vandalism	Mullins, Jesse		6/8/2022	\$26.20
154436	Destrehan High School - DHS	B Building (Formerly Humanities)	Boy's restroom has 1 soap dispenser broken off of the wall	Jesse Mullins	6/8/2022	Bathroom	2nd floor	Jesse Mullins	General Maintenance	Vandalism	Mullins, Jesse		6/8/2022	\$26.20
152459	Destrehan High School - DHS	L Building (Addition 2014)	needs 3 soap dispensers - Students broke dispensers off the wall.	Carrie Brown	4/1/2022	Bathroom	Letha	Carrie Brown	Miscellaneous	Vandalism	Mullins, Jesse		4/1/2022	\$52.40
151114	Hahnville High School - HHS	E Building (Formerly Science)	The mirror over the middle sink has come off the wall and needs to be re-attached ASAP.	Shawn Heiden	2/9/2022	Restroom (Boys)	Downstairs Boys restroom	Shawn Heiden	Restrooms	Vandalism	Bourgeois, Thomas	Reattached mirrors back on the wall.	2/9/2022	\$123.15
151478	Hahnville High School - HHS	E Building (Formerly Science)	Please rehang 3 mirrors and frames above sinks that were ripped down	Thomas Bourgeois	2/22/2022	Bathroom		Thomas Bourgeois	Glass/Wind ow Repairs	Vandalism	Bourgeois, Thomas	Rehung mirror and frames.	2/22/2022	\$49.82
153886	Hahnville High School - HHS	A Building (Formerly Main)	IN HALLWAY THE WATER IS SQUIRTING OUT THE TOP OF THE HAND WASHING STATION IN THE BOYS BATHROOM	Shawn Heiden	5/23/2022	Bathroom	BOYS BATHROOM IN HALLWAY 1	Shawn Heiden	General Maintenance	Vandalism	Bourgeois, Thomas	All water lines where taken loose from sprayers. Reattached all water lines to their sprayers. Stopped water from shooting all inside of hand wash station.	5/23/2022	\$49.82
152330	R. K. Smith Middle School - RKS	Main	Door has been broken off	Maranda Smith	3/28/2022	Bathroom	Boys Bathroom by Concessions	Maranda Smith	Doors and Hardware	Vandalism	Calandra, Mike	Door will be in sometime Monday . 5/23/22. Installed new hinge hung new doors	3/28/2022	\$979.99
154387	Destrehan High School - DHS	A Building	Boys soap dispenser broken off of wall	Jesse Mullins	6/8/2022	Bathroom	near cafe	Jesse Mullins	General Maintenance	Vandalism	Mullins, Jesse		6/8/2022	\$26.20
154436	Destrehan High School - DHS	B Building (Formerly Humanities)	Boy's restroom has 1 soap dispenser broken off of the wall	Jesse Mullins	6/8/2022	Bathroom	2nd floor	Jesse Mullins	General Maintenance	Vandalism	Mullins, Jesse		6/8/2022	\$26.20
152459	Destrehan High School - DHS	L Building (Addition 2014)	needs 3 soap dispensers - Students broke dispensers off the wall.	Carrie Brown	4/1/2022	Bathroom	Letha	Carrie Brown	Miscellaneous	Vandalism	Mullins, Jesse		4/1/2022	\$52.40

158627	Destrehan High School - DHS	C Building (Formerly Gym)	sink is off the wall and broken needs to be replaced	Carolyn Berger	9/30/2022	Locker Room	girls lockerroom	Carolyn Berger	Plumbing	Vandalism	Mullins, Jesse	Broken sink removed from wall Water turned off to fixture Ordering new sink from zeringues plumbing	9/30/2022	\$196.95
159079	Destrehan High School - DHS	F Building (Formerly Technology)	sink needs to be reattached to the wall	Carolyn Berger	10/18/2022	Restroom (Boys)	boys restroom	Carolyn Berger	Plumbing	Vandalism	Mullins, Jesse	Reattached sink to wall	10/18/2022	\$78.60
155338	Hahnville High School - HHS	B Building (Formerly Gym)	Need to replace broken soap dispenser	Thomas Bourgeois	7/11/2022	Locker Room		Thomas Bourgeois	Restrooms	Vandalism	Bourgeois, Thomas	Changed out broken dispenser with a new one	7/11/2022	\$49.82
155343	Hahnville High School - HHS	A Building (Formerly Main)	Need to replace hand sanitizer that was ripped off the wall in the girls bathroom by the cafeteria	Thomas Bourgeois	7/11/2022	Bathroom		Thomas Bourgeois	Restrooms	Vandalism	Bourgeois, Thomas	Installed new hand sanitizer on wall	7/11/2022	\$49.82
155347	Hahnville High School - HHS	E Building (Formerly Science)	Downstairs boys bathroom need to replace 2 soap dispensers that were ripped off the wall	Thomas Bourgeois	7/11/2022	Bathroom		Thomas Bourgeois	Restrooms	Vandalism	Bourgeois, Thomas	Replaced 2 missing dispensers with new ones.	7/11/2022	\$49.82
155351	Hahnville High School - HHS	E Building (Formerly Science)	Boys upstairs bathroom Replace 3 mirrors that were ripped off the wall	Thomas Bourgeois	7/11/2022	Bathroom		Thomas Bourgeois	Restrooms	Vandalism	Bourgeois, Thomas	7/13/22 LaPlace glass was called out to measure and order new mirrors 11/2/22 Laplace glass installed 3 new mirrors	7/11/2022	\$728.94
155353	Hahnville High School - HHS	E Building (Formerly Science)	Replace 2 soap dispensers that were ripped off the wall	Thomas Bourgeois	7/11/2022	Bathroom		Thomas Bourgeois	Restrooms	Vandalism	Bourgeois, Thomas	Installed 2 new soap dispensers where they were ripped off the wall	7/11/2022	\$49.82
155354	Hahnville High School - HHS	G Building (Addition 2014)	Downstairs boys bathroom replace 3 soap dispensers that were ripped off the wall	Thomas Bourgeois	7/11/2022	Bathroom		Thomas Bourgeois	Restrooms	Vandalism	Bourgeois, Thomas	Installed 3 new soap dispensers where they were ripped off the wall	7/11/2022	\$49.82
163460	Cammon, Albert, Middle School - ACM	B Building (Formerly New Addition Wing2)	please send 2 toilet paper dispensers. Ours were ripped off the wall and they are broken	Erika Ide	3/30/2023	Bathroom	restroom	Erika Ide	Restrooms	Vandalism	Landeché, James	Done	3/30/2023	\$26.20
161273	Destrehan High School - DHS	D Building (Formerly Math)	girls restroom sink needs to be reattached to the wall it on the floor	Carolyn Berger	1/13/2023	Restroom (Girls)	girls restroom	Carolyn Berger	Plumbing	Vandalism	Mitchell, Colin		1/13/2023	\$133.61
164449	Destrehan High School - DHS	C Building (Formerly Gym)	The first divider in the boys restroom needs to be looked at. Someone ripped it from the wall. We have the screws in Admin Office for it. But I am not sure if brackets are broken.	Carrie Brown	5/2/2023	Bathroom	Boys Bathroom	Carrie Brown	Restrooms	Vandalism	Cortez, Greg	Had to drill new holes because they were pulled out of the wall reattached divider is back on wall	5/2/2023	\$0.00
164449	Destrehan High School - DHS	C Building (Formerly Gym)	The first divider in the boys restroom needs to be looked at. Someone ripped it from the wall. We have the screws in Admin Office for it. But I am not sure if brackets are broken.	Carrie Brown	5/2/2023	Bathroom	Boys Bathroom	Carrie Brown	Restrooms	Vandalism	Cortez, Greg	Had to drill new holes because they were pulled out of the wall reattached divider is back on wall	5/2/2023	\$0.00

Respectfully Submitted:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies on April 28th, 2025 that a copy of the foregoing was served via electronic mail on April 28, 2025, to Counsel for Defendants Counsel for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; TikTok Inc.; TikTok LTD; TikTok LLC.; ByteDance Inc.; ByteDance LTD; Snap Inc.; YouTube, LLC; Google LLC; and Alphabet Inc.:

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/s/ Ron A. Austin

Ron A. Austin

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VERIFICATION

I, Ron Austin, am signing as Special Counsel to Saint Charles Parish Public Schools. I am authorized to make this verification on behalf of Saint Charles Parish Public Schools. The foregoing Plaintiff's Answers to Defendants' Interrogatories to Saint Charles Parish Public Schools (Set I) represents a corporate response, based on information, in part, assembled by the employees and/or representatives of Saint Charles Parish Public Schools. Because the matters stated in the document identified above constitute a corporate response, they are not all necessarily within my personal knowledge, or within the personal knowledge of any single individual. Subject to these limitations, the information contained in the foregoing response is, to the best of Saint Charles Parish Public Schools' knowledge, true and correct. Saint Charles Parish Public Schools reserves the right to make any changes should it appear that any omissions or errors have been made.


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